

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

ULYSSES RODRIGUEZ CHARLES, )  
)  
Plaintiff, )  
)  
v. )  
)  
CITY OF BOSTON; JOHN MULLIGAN, in )  
his individual capacity; WILLIAM KEOUGH, )  
in his individual capacity; PAUL RUFO, in his )  
individual capacity; KATHLEEN HANLEY )  
JOHNSON, in her individual capacity; )  
STANLEY BOGDAN, in his individual )  
capacity; JOHN DOE and JANE DOE, )  
supervisors in the Boston Police Department, in )  
their individual capacities; CHARLES CAMPO, )  
in his individual capacity; JOHN ZANINI, in )  
his individual capacity; SUFFOLK COUNTY )  
and SUFFOLK COUNTY DISTRICT )  
ATTORNEY'S OFFICE, )  
)  
Defendants. )

---

CASE NO. 04-10986-NG

**MOTION OF DEFENDANT CHARLES CAMPO TO FILE  
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6) IN  
EXCESS OF 20 PAGES**

Pursuant to Local Rule 7.1(B)(4), the Defendant Charles Campo respectfully requests leave to file a memorandum of law in excess of twenty (20) pages made in support of his motion to dismiss the Plaintiff's complaint pursuant to Fed. R. Civ. P. 12(b)(6). As grounds for this motion Mr. Campo states that the Plaintiff filed a 27 page complaint containing seven (7) counts against multiple parties.

In order to address all of the claims made against him and to develop the arguments made in support of the motion, Mr. Campo's memorandum of law will exceed the 20 page limitation. Mr. Campo's motion involves defenses based upon absolute immunity and the Plaintiff's failure to file the complaint within the applicable statute of limitations. In order to fully explain the grounds for these defenses, five (5) additional pages are necessary. Mr. Campo respectfully suggests the additional pages are necessary for presenting his argument and will assist the Court in its review of the merits of the motion.

CHARLES CAMPO,  
By his attorney,

/s/ Richard M. Egbert  
Richard M. Egbert (BBO #151800)  
99 Summer Street  
Boston, MA 02110  
617-737-8222

**CERTIFICATE OF SERVICE**

I, Richard M. Egbert, hereby certify that I served a copy of this document by first class mail, postage prepaid upon all parties of record on October 15, 2004

/s/ Richard M. Egbert